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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

NATHAN BURGOON and CALEB
 LANDERS, on behalf of themselves and all
 others similarly situated,

Plaintiffs,

v.

NARCONON OF NORTHERN
 CALIFORNIA d/b/a NARCONON
 REDWOOD CLIFFS, HALCYON
 HORIZONS, a California Corporation;
 NARCONON FRESH START d/b/a
 WARNER SPRINGS, a California
 Corporation; ASSOCIATION FOR BETTER
 LIVING AND EDUCATION
 INTERNATIONAL, a California Corporation;
 NARCONON WESTERN UNITED STATES,
 a California Corporation; NARCONON
 INTERNATIONAL, a California Corporation;
 and DOES 1-100, ROE Corporations I – X,
 inclusive,

Defendants.

Case No.: 3:15-cv-01381-EMC

PLAINTIFFS' TRIAL WITNESS LIST

Bench Trial: January 4, 2015

Time: 9:00am

Judge: Hon. Edward M. Chen

Complaint Filed: March 25, 2015

JURY TRIAL DEMANDED

Pursuant to the Court's October 2, 2015 Order Re Trial on Mental Capacity and Undue
 Influence, Plaintiffs respectfully submit the following list of witnesses they expect to call at the
 January 4, 2016 bench trial as follows. For those witnesses expected to testify by way of
 deposition designations, Plaintiffs anticipate only brief transcript excerpts will be necessary.

WITNESSES LIKELY TO BE CALLED IN PERSON		
WITNESS	SUBSTANCE OF TESTIMONY	EST. TESTIMONY LENGTH
Nathan R. Burgoon	Mr. Burgoon will testify on his history of drug addiction and on his admission and re-admission to Narconon, including: his use of heroin and other drugs and related intoxication and withdrawal; his mental and physical state; his comprehension of the arbitration clause; his interactions with Narconon representatives; his history of post-traumatic stress disorder (PTSD) and his experience of PTSD during the Narconon admission and readmission process.	1 hour, including cross examination
Caleb Landers	Mr. Landers will testify on his history of drug addiction and on his admission to Narconon, including: his use of heroin and other drugs and related intoxication and withdrawal; his mental and physical state; his comprehension of the arbitration clause; and his interactions with Narconon representatives.	1 hour, including cross examination
Dr. David Smith	Dr. Smith will testify on the medical effects of heroin and opioid addiction and withdrawal, and on the medical condition of Caleb Landers' and Nathan Burgoon during Narconon admissions and/or re-admission processes. His conclusions are that Mr. Burgoon and Mr. Landers' abilities to understand the arbitration clauses were substantially compromised by opioid-related disorder, because this disorder, including intoxication and withdrawal, negatively affects the frontal cortex of the brain directly in ways that impacts cognitive functioning.	1 hour, including cross examination
Stacy Gundmusson	Ms. Gundmusson will testify regarding NFS' policies and procedures regarding admission of new students and their placement and treatment in the withdrawal house. She will also testify regarding her understanding, or lack thereof, of arbitration and the arbitration clause.	n/a - Deposition Designations

WITNESSES LIKELY TO BE CALLED IN PERSON		
WITNESS	SUBSTANCE OF TESTIMONY	EST. TESTIMONY LENGTH
Kirill Chapurski	Mr. Chapurski will testify regarding his encounters with Caleb Landers on the day of his admission.	n/a - Deposition Designations
Tiffany Bogart	Ms. Bogart will testify regarding her encounter with Caleb Landers while filling out intake paperwork, and NFS' policy of having only guarantors initial the arbitration clause in the admissions agreement.	n/a - Deposition Designations
Jacob Lopez	Mr. Lopez will testify about his encounters with Nathan Burgoon on the day of his admission.	n/a - Deposition Designations
Sara Lopez	Ms. Lopez will testify about her encounters with Nathan Burgoon on the day of his admission.	n/a - Deposition Designations
Jesse Quaid	Mr. Quaid's deposition is set to take place Dec. 8, 2015. It is anticipated that he will testify regarding his interactions with Mr. Burgoon on July 27 and August 3, 2014 and NNC's policies and procedures for admission and readmission of students.	n/a - Deposition Designations
Leslie Ryan	Ms. Ryan's deposition is set to take place Dec. 15, 2015. It is anticipated that she will testify regarding her interactions with Nathan Burgoon between July 27 and August 3, 2014.	n/a - Deposition Designations
William Harris	Mr. Harris' deposition is set to take place Dec. 15, 2015. It is anticipated that he will testify regarding his interactions with Mr. Burgoon between July 27 and August 5, and NNC's policies and procedures for admission and readmission of students.	n/a - Deposition Designations
Ashley Regalia	Ms. Regalia's deposition is set to take place Dec. 8, 2014. It is anticipate she will testify regarding her observations of Mr. Burgoon during the intake process.	n/a - Deposition Designations

1 RESPECTFULLY SUBMITTED AND DATED this 7th day of December, 2015.

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CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on December 7, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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1 DATED this 7th day of December, 2015.

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